



September 9, 2022

Hon. Sarah Netburn
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: Joint Update on Case Discovery and Settlement Discussions

Stephen Gannon v. Great World Enterprises, Inc., et al.
Case # 22-cv-1032

Dear Judge Netburn,

This law firm represents Plaintiff Stephen Gannon ("Plaintiff") in this action. We write to you jointly with counsel for Defendant Great World Enterprises Inc. ("Great World"), in accordance with the instruction in the Case Management Plan and Scheduling Order (Docket No. 22) to inform the Court about the status of discovery and settlement discussions. We did not receive a response to our communication with Defendant Pramukh 200 Inc ("Pramukh") regarding this letter.

Mr. Rapaport, counsel for Great World, and Plaintiff's counsel have engaged in extensive and productive settlement discussions. While a settlement has not been reached, the parties are hopeful that a settlement might be achievable. The tenant at the subject property of this ADA access case, Pramukh, has informed Mr. Rapaport's client, Great World (the landlord), that they may have to cease operations and close their doors, which has complicated matters. The makeshift ramp at the entrance of the store has been replaced with a step, which Plaintiff contends remains out of compliance with the mandates of the ADA. Discussions between Mr. Ford and Mr. Rapaport are ongoing.

Plaintiff has, on the date of this letter, served initial disclosures and discovery requests upon Defendants. It is hoped that the case might settle before any response is necessary, but this will serve to move the case forward such that discovery might be complete by December 16, 2022 as set forth in the Scheduling Order.

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We thank the court for its attention in this matter.

Respectfully Submitted,

/s/ Adam Ford

Adam Ford

Ford & Huff LC

Counsel to Plaintiff

/s/ Marc Rapaport

Marc Rapaport

Rapaport Law

Counsel to Defendant Great World Enterprises, Inc.

cc: All Counsel of Record (via ECF)